



**NOV 23 2016**

Mr. Kenneth H. P'Pool  
Deputy State Historic Preservation Officer  
Mississippi Department of Archives and History  
P. O. Box 571  
Jackson, MS 39205-0571

RE: Reinitiation of Proposed Gulfport Job Corps Center Section 106 process – Mississippi  
Department of Archives and History (MDAH) Project Log #03-003-16, Harrison County

Dear Mr. P'Pool:

The Department of Labor (DOL) and Job Corps formally reinitiated consultation with your office in March 2016, under Section 106 of the National Historic Preservation Act (NHPA), for the Gulfport Job Corps Center (JCC), which was originally known as the 33<sup>rd</sup> Avenue High School. DOL would now like to continue the consultation process by providing your office with the documentation required in 36 CFR 800.6(a)(3) and 800.11(e).

### **Background**

Job Corps is a national training and employment program administered by the DOL. Job Corps addresses multiple barriers to employment faced by disadvantaged youth throughout the United States. Job Corps' mission for eligible young adults is to teach them the skills they need to become employable, prepare them for careers, and further their education.

There is substantial demand for Job Corps services in the Gulfport region. Since 2015, the Gulfport JCC and the other centers in the State of Mississippi have provided services to 1,501 of the approximately 12,000 eligible students who applied for services. While some of these eligible applicants were placed in centers in surrounding states, there is substantial unmet demand for Job Corps services in Mississippi.

The Gulfport JCC is one of the highest ranking JCCs in the nation. The Job Corps' Outcome Measurement System (OMS) is a measure of center performance that is based on 1) placement in employment or higher education, 2) attainment of a degree or certificate, 3) literacy and numeracy gains, and 4) efficiency/cost per participant. The most recent OMS ranking for Gulfport (through February 2016) is a rank of 6 out of 126 centers across the county, an indication of the quality training the Gulfport JCC provides.

DOL proposes to redevelop the Gulfport JCC so that it can provide training at the 280-student capacity level for which it was originally designed. This Gulfport JCC redevelopment project

would support and enhance Job Corps' educational and training mission and ensure that its facilities continue to provide an optimal environment for students and Job Corps personnel.

## **History**

The Gulfport JCC, located at 3300 20th Street, Gulfport, Mississippi (Attachment A, Figures 1 and 2), was originally constructed in 1954 as a high school for African-American students, known as the 33rd Avenue High School. Designed by Gulfport architect Milton B.E. Hill in the International Style, the school was meant to reflect the State's intention of providing new and state-of-the-art facilities to black students that were equal with white facilities, in order to stave off integration during the Equalization Period in Mississippi. The Equalization Period in Mississippi lasted from the mid-1940s to the early 1960s, and despite the U.S. Supreme Court's *Brown v. Board of Education* decision in 1954, it took Mississippi well over a decade to finally dismantle its segregation programs fully.

When the schools in Gulfport were finally integrated in 1969, the 33rd Avenue High School was closed. The school's buildings, known as Buildings 1, 2, and 5, served as a Head Start Center for several years, and opened as the Gulfport JCC in 1978. Building 1 was used for administration and education, Building 2 was the gymnasium, and Building 5 was the cafeteria (Attachment A, Figure 3). The buildings received extensive damage from Hurricane Katrina in 2005 and have not been used since.

In 2009, when the Gulfport JCC reopened, eight modular buildings were brought in to compensate for the loss of use of Buildings 1, 2, and 5. The modular buildings were only intended to be used for 3 to 5 years; however, they have now been in use for 7 years. With the modular buildings, the Gulfport JCC has been limited to a capacity of 107 students, which is 173 students less than its pre-Katrina capacity and the proposed capacity for this facility sought by the Job Corps. In addition, the existing facility lacks hands-on vocational training space and recreation space for students.

In 2011, Buildings 1, 2, and 5 were found to be potentially eligible for listing in the National Register of Historic Places (NRHP) by the Mississippi Department of Archives and History (MDAH) for Criterion A – “associated with events that have made a significant contribution to the broad patterns of our history” (e.g., Ethnic Heritage and Education and the Equalization Period); and for Criterion C – “that embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master” (e.g., architect Milton B.E. Hill and International Style). DOL agreed with that designation.

The Gulfport JCC site was included in a Phase I Archaeological Survey by Brockington and Associates, Inc., which was completed in February 2012. The Brockington survey found no previously recorded archaeological sites and did not recommend any additional sites as potentially eligible for listing in the NRHP.

In a letter dated March 14, 2016, MDAH concurred with the DOL that Buildings 1, 2, and 5 were eligible for listing in the NRHP, that there were no other NRHP-eligible buildings within the area of potential effects (APE), and that the redevelopment of the Gulfport JCC would result in an

adverse effect on the three buildings. In August 2016, Gulf South Research Corporation performed additional research into historic resources within the APE and did not find any new resources that would be eligible for listing in the NRHP.

Also, in 2016 the DOL contracted with Laird and Smithers, Inc. of Jackson, Mississippi, to prepare a Structural Forensic Engineering Analysis Report on Buildings 1, 2, and 5 of the Gulfport JCC. A copy of the report, which was finalized in August 2016, was furnished to MDAH on September 29, 2016. One of the conclusions of the report is that the buildings will require “strengthening due to inadequacies of the original construction to support gravity loads. All three structures require significant structural modifications to provide a load path for lateral wind loads to be transferred from the origin of the wind load on the building structure to the foundation.” There are also areas of Building 1 that will require strengthening due to the current condition of the building. The study analyzed the buildings, but did not analyze the foundations, which may require further study and additional strengthening.

In order to return the Gulfport JCC to full operational capacity, the DOL is proposing three action alternatives, one of which is the Preferred Alternative. A fourth alternative, the No Action Alternative is also included. These four alternatives were presented to the public at the June 14, 2016, Environmental Assessment (EA) scoping meeting, and no additional alternatives were advocated for consideration by the public. Comment cards filled out by the public indicated a preference for selection of either Alternative 1 or 3 as the Preferred Alternative. One less respondent favored Alternative 1 only as the Preferred Alternative. These alternatives are described below and are summarized in Tables 1 and 2.

### **Alternative 1: Rehabilitation**

Alternative 1 is a complete rehabilitation of the three buildings (Attachment A, Figure 4). This is the costliest alternative, with an estimated cost of at least \$35 million. The DOL Program Guidelines for Job Corps Centers calls for 92,807 square feet (sf) for 280 students, and this alternative would provide approximately 82,340 sf of usable space. Design and construction for Alternative 1 would be expected to take approximately 36 months, with 18 months for each phase. This alternative would result in the least amount of adverse effects on the historic structures, but some adverse effects may be unavoidable considering the unknown nature of the structural integrity of all systems on the site.

Under Alternative 1, the DOL would rehabilitate the existing historic structures, with new interior structural elements (Photographs 1-3). Buildings 1, 2, and 5 would undergo major renovations, but would retain their current outward façades as much as possible, in keeping with the historical nature of those buildings. Building 1 would be the primary administration and education building. Building 2, the gymnasium, would be the recreation building, and Building 5 would remain the cafeteria.

**Table 1. Summary of Alternatives**

|                                   | <b>Alternative 1<br/>Rehabilitation</b>   | <b>Alternative 2<br/>New Construction</b>                          | <b>Preferred Alternative<br/>Retain Existing Façades</b>  | <b>Alternative 4<br/>No Action Alternative</b>  |
|-----------------------------------|---|--|---|---|
| Renovation                        | Rehabilitate Buildings 1, 2, and 5  | No renovation  | Retain façades for Buildings 1 and 2, renovating as necessary to provide structural stability   | No renovation   |
| Demolition/Removal                | Remove modular buildings and demolish Building 9                                  | Demolish Buildings 1, 2, 5, and 9 and remove all modular buildings | Retain the street-facing façades of Buildings 1 and 2. Demolish Buildings 5 and 9. Remove all modular buildings.  | No demolition/removal   |
| New Construction                  | Construct vocational building, storage/maintenance building, and new energy plant | All new construction   | Construction of new buildings behind the façades of Buildings 1 and 2. Construct new cafeteria, hard vocational building, storage and maintenance building, and energy plant. | No new construction   |
| Structural Integrity of Buildings | Significant reinforcement would be needed to maintain structural integrity.       | New construction would meet current structural requirements.       | Significant difficulty to maintain structural integrity of façades during construction  | Buildings would continue to deteriorate   |
| Estimated Total Cost              | \$35,000,000  | \$28,000,000   | \$30,000,000  | No additional costs would occur unless buildings reach a level of deterioration that would require demolition |
| Time Required for Completion      | 36 months   | 34 months  | 44 months   | Not applicable; no construction needed  |
| Functionality for Job Corps       | Below average   | High   | Better than average   | Not applicable  |

**Table 2. Gross Square Feet by Alternative**

| <b>Function</b>                           | <b>DOL Program Guidelines (GSF for 280 Students)</b> | <b>Alternative 1 Rehabilitate Existing Buildings</b> | <b>Alternative 2 New Construction</b> | <b>Alternative 3 (Preferred): Retain Existing Façades</b> | <b>Alternative 4 No Action Alternative</b> |
|---|--|--|---------------------------------------|---|--|
| Administration, Education, Medical/Dental | 32,718   | 35,520   | 35,620                                | 36,800  | 13,000                                     |
| Education/Training – Hard Vocational      | 23,100   | 15,000   | 24,500                                | 18,800  | 1,200                                      |
| Storage and Maintenance                   | 6,847  | 7,200  | 6,500                                 | 7,200   | 6,000                                      |
| Food Service                              | 9,072  | 6,820  | 9,280                                 | 9,280   | 3,000                                      |
| Recreation                                | 18,270   | 15,000   | 20,320                                | 20,320  | 0  |
| Energy Plant                              | 2,800  | 2,800  | 2,800                                 | 2,800   | 0  |
| <b>Total</b>                              | <b>92,807</b>  | <b>82,340</b>  | <b>98,920</b>                         | <b>95,200</b>   | <b>23,200</b>                              |





**Photograph 1: Building 1, West Elevation**



**Photograph 2: Building 1, South Elevation**



**Photograph 3: Building 2, South Elevation**

Other construction related to this Alternative includes the following:

- Building 9 (storage and maintenance) would be demolished, and a new storage and maintenance building would be built.
- Buildings 10 and 11 (dormitories) would be used as is.
- All modular buildings currently being used on-site would be removed.
- A new, 15,000-gross-square-foot (GSF) building would be constructed on the site of the old elementary school, to accommodate vocational training and provide shop-related skills training for occupations in demand. The new vocational building would be similar in outward appearance to Buildings 1 and 2.
- A central energy plant to serve the campus would be added.
- Parking spaces for 90 vehicles would be available across 20th Street from Buildings 1 and 2 and within the site in spaces currently designated for parking.

While Alternative 1 preserves the original buildings, several challenges are associated with this Alternative, including the following:

- There are considerable uncertainties regarding the structural integrity/stability of key structural elements in Buildings 1 and 2. During the design phase, the integrity of the tubular steel support columns would need to be further studied and could result in the need for large-scale replacement and reinforcement of those structural elements.

Numerous I-beams and exterior columns show signs of excessive deterioration due to weather exposure, and those could need to be replaced or reinforced, and the entire roof system would require replacement and anchoring to prevent future hurricane damage.

- The existing buildings lack sufficient lateral stability to resist wind loads during a hurricane, and reinforcement of the walls and foundations would be necessary (if possible) to meet current code standards for wind resistance. Reinforcement of the structural steel framing, construction of concrete shear walls, and potentially additional foundation stabilization for proper transfer of lateral loads (i.e., loads due to wind), as required by the current building code, would be required.
- Although the overall GSF of a renovated Building 1 compares favorably to that which would be built as part of the design of new structures (Alternative 2), the restrictions inherent in renovating the existing building would yield less usable space and result in a less than optimal space layout for the various functions that the Job Corps needs. These restrictions include the following:
  - Renovation of the building to comply with accessibility guidelines for the two half-stairwells on the lower floor of the building would subtract from the amount of usable space.
  - Restrictions imposed by the corridor walls would result in the separation of related administrative functions.
  - Renovation of the existing building would result in less than optimal classroom sizes for some soft trade courses, such as Nurse's Assistant.
  - The layout makes it more difficult to maintain separation of incoming students from the remainder of the student body during their orientation period, something that is considered essential to providing new students the opportunity to assimilate to their new environment.
  - The intrusion of new concrete shear walls for stabilization of the structures would encroach on currently usable space.
- It is estimated that the reduction in usable space in Building 1 could be as much as 5 percent, when compared to that for a new structure. The resulting cumbersome nature of the functional layout of the renovated Building 1 is difficult to measure, but carries with it inefficiencies that affect the day-to-day function of Gulfport JCC staff and fails to provide an optimal space layout that enhances the environment for the students at the Gulfport JCC.
- Building 2, the gymnasium, does not meet current program standards for recreation, providing only 53.6 GSF per student compared to the 65.3 GSF per student recommended by DOL program guidelines. It lacks space for locker rooms, arts and crafts, weight rooms, and aerobic rooms. The existing facility spaces that served as locker rooms in the past (located under the bleachers) are not conducive to the Job Corps environment in terms of providing supervision and providing comfortable spaces that have natural light. Additionally, the location of Building 2 does not adhere to the campus design that Job Corps has found to best serve the students. Placement of the recreation building close to the dormitories enhances the usage of the building during evening and weekend hours, which is advantageous to the students incorporating the social aspects of recreation into their overall Job Corps experience.

- Space available for construction of the vocational trades building is limited, resulting in an estimated 35 percent less space for training for trades than is recommended by DOL program guidelines. The space available for a vocational trades building is limited by the location of the existing cafeteria, the need to construct the vocational trades building in a location that provides the required street access for the shop bays, and City of Gulfport setback requirements. As a result, the vocational trades building would have four shop bays for training instead of the desired seven shop bays.
- Building 5, the cafeteria, does not meet current standards for food service, providing only 24.4 GSF per student, compared to the 32.4 GSF per student recommended by DOL program guidelines. The smaller size results in more crowded conditions and results in three sittings rather than the desired two sittings for lunch. Additionally, the cafeteria would require extensive modifications to meet current codes. The entire roof system would need to be replaced and tied to the walls. A lateral shear strength system would be required, which would further restrict usable space, and the foundation would require partial demolition to determine if it could support the shear strengthening.

### **Alternative 2: New Construction**

Alternative 2 calls for the demolition of all buildings on-site, with only the dormitory buildings remaining (Attachment A, Figure 5). This is the least expensive alternative, with an estimated cost of \$28 million. DOL Program Guidelines for Job Corps Centers calls for 92,807 sf for 280 students, and this alternative would provide 98,920 sf of usable space. Design and engineering for Alternative 2 were completed in 2011; however, modifications would be needed to meet current design codes and energy standards and would take an estimated 12 months. Construction would take an estimated 22 months. This alternative would result in the greatest adverse effect to the historic structures, and those adverse effects would be mitigated through various means developed, such as Historic American Building Survey (HABS) documentation, or interpretive signage. The development of mitigation measures would be accomplished through the Section 106 consultation process and memorialized in the development of a Memorandum of Agreement (MOA) between DOL, the City, and the MDAH.

Alternative 2 involves nearly all new construction. Buildings 1, 2, 5, and 9 would be demolished, all modular buildings would be removed, and new buildings would be constructed. The new construction would provide spaces for administration, classrooms, vocational training, food service, and recreation. Only the existing dormitory buildings would be retained (Buildings 10 and 11). A central energy plant to serve the campus would be added to satisfy the Federal energy savings mandate. Parking spaces for 90 vehicles would be available across 20th Street from Buildings 1 and 2 and within the site in spaces currently designated for parking.

Alternative 2 reflects the highest functioning plan for Job Corps, both in terms of the student experience and satisfaction, and the ability of Job Corps to keep pace with the demands of the modern job training environment. It is the only alternative that can provide the full seven training bays to better meet the training needs for the Job Corps and that benefit Gulfport JCC students and area employers.



### **Alternative 3/Preferred Alternative: Retain Existing Façades**

Alternative 3, which is DOL's preferred alternative calls for the retention of the street-facing façades of Buildings 1 (south and west) and 2 (south) (see Photographs 1-3), and new building(s) would be constructed behind the façades to provide administration, educational, medical/dental, and recreation spaces that meet the needs of the Gulfport JCC and DOL program guidelines (Attachment A, Figure 6). The price of this alternative is estimated to be \$30 million. DOL Program Guidelines for Job Corps Centers call for 92,807 sf for 280 students, and this alternative would provide 95,200 sf of usable space. The design period for Alternative 3 would be approximately 18 months, and construction would take an estimated 26 months. While this alternative would result in some adverse effects on the historic structures, those adverse effects would be mitigated through various means developed and accomplished through the Section 106 consultation process, such as Historic American Building Survey (HABS) documentation or interpretive signage. The development of all mitigation measures, including treatment of the existing façades, would be accomplished through the consultation process and be memorialized in the MOA.

Although some façades of Buildings 1 and 2 would be retained in this alternative, Building 5, the cafeteria, would be demolished and replaced by a new, modern cafeteria. Other construction related to this alternative includes the following:

- Buildings 1 and 2 would be physically joined by a covered walkway.
- A new building would be constructed for vocational training for shop-related trades and for storage and maintenance on the site of the old elementary school.
- The dormitories (Buildings 10 and 11) would be retained.
- A central energy plant to serve the campus would be added to satisfy the Federal energy savings mandate.
- Parking spaces for 90 vehicles would be available across 20th Street from Buildings 1 and 2 and within the site in spaces currently designated for parking.

The Preferred Alternative would result in a modern Job Corps instructional campus. While the total GSF for the Preferred Alternative meets or exceeds the total DOL program guidelines, the GSF for vocational trades building would be approximately 19 percent smaller than DOL program guidelines recommend, thereby impacting the training the Gulfport JCC could provide.

Challenges associated with the Preferred Alternative include the following:

- Construction of new structures behind the façades of Buildings 1 and 2 could require extensive buttressing to tie the existing façades into the new buildings, demolition of the existing slabs for new footings for the new structures, and other complex requirements.
- Working with the existing façades adds additional costs and time when compared with costs and time associated with Alternative 2.
- Working with the existing façades imposes size, location, and building configuration restrictions for the buildings.
- GSF would be similar to DOL program guidelines for all functions except hard vocational education/training; however, building configuration restrictions would result

in less usable space and a less than optimal layout for campus buildings when compared with Alternative 2.

- The amount of available land and City of Gulfport building setback requirements limit the amount of space available for the hard vocational trades training building, resulting in a facility that would be substantially smaller than DOL program guidelines recommend. The 19 percent less space (approximately 80 feet in building length) means that the Gulfport JCC would have five shop bays for training, instead of the optimal seven shop bays that would be built under Alternative 2.

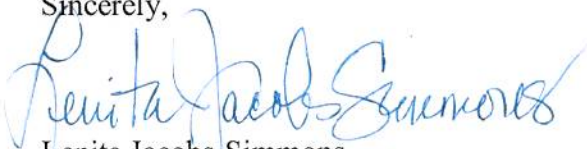
#### **Alternative 4: No Action Alternative**

The No Action Alternative would maintain the Gulfport JCC campus in its current configuration and functionality. The dormitories and the modular buildings would be retained and used as is, to the extent feasible for the temporary modular structures. The student capacity would remain at 107 students. Training in vocational trades, other than electrical, would remain unavailable to students. Buildings 1, 2, and 5 would continue to deteriorate due to weather exposure until they are deemed to be a health and safety hazard, at which time they would be demolished.

The DOL has issued the draft EA on November 17, 2016 analyzing impacts related to this project and proposing the same alternatives outlined above. DOL plans to complete the consultation for Section 106 concurrently with the NEPA process. The DOL plans on consulting with the public per Section 800.3(e) and 800.6(a)(4) in public meetings and will hold a public meeting in January 2017, after the 30-day comment period for the draft EA and this Section 106 package. Dates and times will be forthcoming to you as soon as they are scheduled.

The DOL looks forward to consultation with your office and the other consulting parties.

Sincerely,



Lenita Jacobs-Simmons  
National Director  
Office of Job Corps

cc: Charlene Dwain Vaughn, AICP  
Assistant Director  
Office of Federal Agency Programs  
401 F Street, NW, Suite 308  
Washington, DC 20004

Jim Woodrick, Director of Historic Preservation Division  
Mississippi Department of Archives and History  
Post Office Box 571  
Jackson, MS 39205

Kenneth H. P'Pool, Deputy State Historic Preservation Office  
Mississippi Department of Archives and History  
Post Office Box 571  
Jackson, MS 39205

John Kelly, Chief Administrative Officer  
The City of Gulfport  
P.O. Box  
1780 Gulfport, MS 39502

Myrtis Franke  
Southern District Director  
Office of Senator Thad Cochran  
2012 15th Street, Suite 451  
Gulfport, Mississippi 39501  
Lindsay Linhares: [Lindsay\\_Linhares@cochran.senate.gov](mailto:Lindsay_Linhares@cochran.senate.gov)

Jimmy Woullard, President of 33<sup>rd</sup> High School Alumni Association  
4168 Goldfinch Drive  
Gulfport, MS 39501

Gayle Tart, Esquire  
Appearing on Behalf of 33rd Alumni Association and the Quarters Group  
Post Office Box 638  
Long Beach, MS 39560

Sandra Wyche, Member of 33rd High School Alumni Association  
3525 Nunnally Street  
Gulfport, MS 39501

Richard "Kim" Marsh, Member of 33rd High School Alumni Association  
8138 34<sup>th</sup> Avenue  
Gulfport, MS 39501

Ella Holmes Hines, Member of 33rd High School Alumni Association  
P.O. Box 2425  
Gulfport, MS 39505

Ruth Thagget White, Member of 33rd High School Alumni Association  
2320 – 32<sup>nd</sup> Avenue  
Gulfport, MS 39501

Johnnie Sanders, Member of 33rd High School Alumni Association  
4610 West Raid Road Street  
Gulfport, MS 39501

Lela Ann Lane, Member of 33rd High School Alumni Association  
1212 Camp Avenue  
Gulfport, MS 39501

Patricia Anne Silva, Member of 33rd High School Alumni Association  
303 Mary Drive  
Gulfport, MS 39503

Gary Anderson  
1410 24<sup>th</sup> Avenue  
Gulfport, MS 39510

Sam E. Arnold  
3012 21<sup>st</sup> Street  
Gulfport, MS 39501

Mel Arsenault  
Mississippi State Port Authority  
2510 14<sup>th</sup> Street, Ste. 1450  
Gulfport, MS 39501

Kenneth C. Casey Sr.  
1014 Mills Ave, Gulfport, MS 39501

Glenn Cobb  
3709 Reynosa Drive  
Gulfport, MS 39501

Glenda F. Collins  
P.O. Box 1881  
Gulfport, MS 39502

Eric R. Cooper  
1607 19th St,  
Gulfport, MS 39501

Lisa A. Flood Etienne  
18476 Longwood Dr,  
Saucier, MS 39574

Chris Fisher  
1600 24th Ave,  
Gulfport, MS 39501

Jessie Fitzgerald  
4628 Goldfinch Dr,  
Gulfport, MS 39501

Jerry Freightman  
1208 Camp Ave,  
Gulfport, MS 39501

Councilwoman Ella Holmes-Hines  
PO Box 2425  
Gulfport, MS 39505

Brillia Hudson  
3117B Seagull St  
Gulfport, MS 39501

Annie James  
3530 20<sup>th</sup> Street  
Gulfport, MS 39501

Geraldine Jones  
107 30<sup>th</sup> Street  
Gulfport, MS 39507

Gwendolyn Jones  
943 Cleveland Avenue  
Gulfport, MS 39507

Prince Jones  
1705 60<sup>th</sup> Avenue  
Gulfport, MS 39501

Lelia Lang  
1212 Camp Avenue  
Gulfport, MS 39501

Dorothy McClendon  
1519 19th St,  
Gulfport, MS 39501

Dorothy Robert  
404 Teagarden Road  
Gulfport, MS 39507

Ruthie Thaggart-White  
2320 32nd Avenue  
Gulfport, MS 39501

Nakisha R. Williams  
15030 Government St,  
Gulfport, MS 39503



**ATTACHMENT A**  
**FIGURES**

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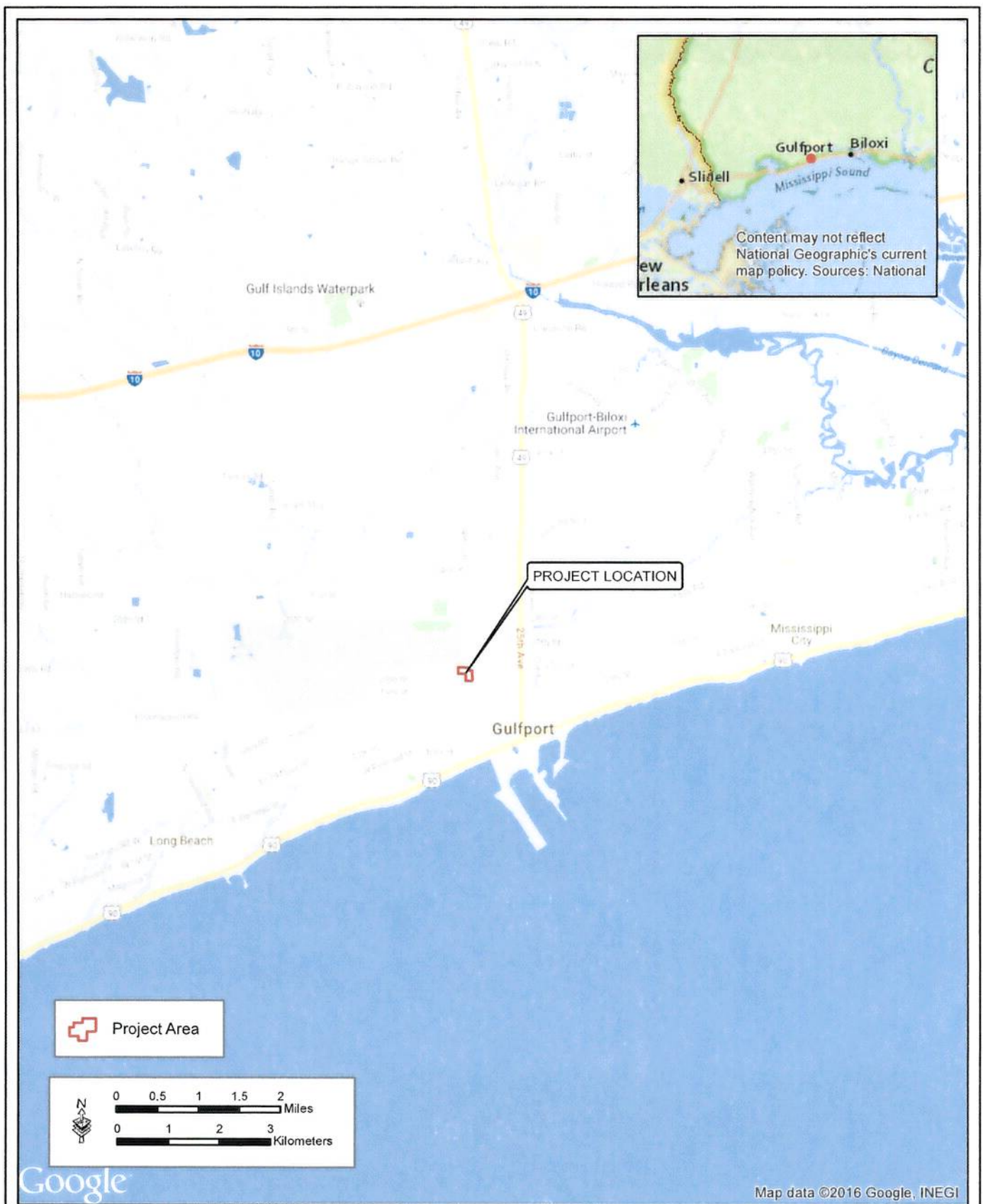


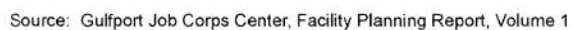
Figure 1. Vicinity Map







Gulfport, Mississippi



August 2016

# Gulfport Job Corps Center

Gulfport, Mississippi

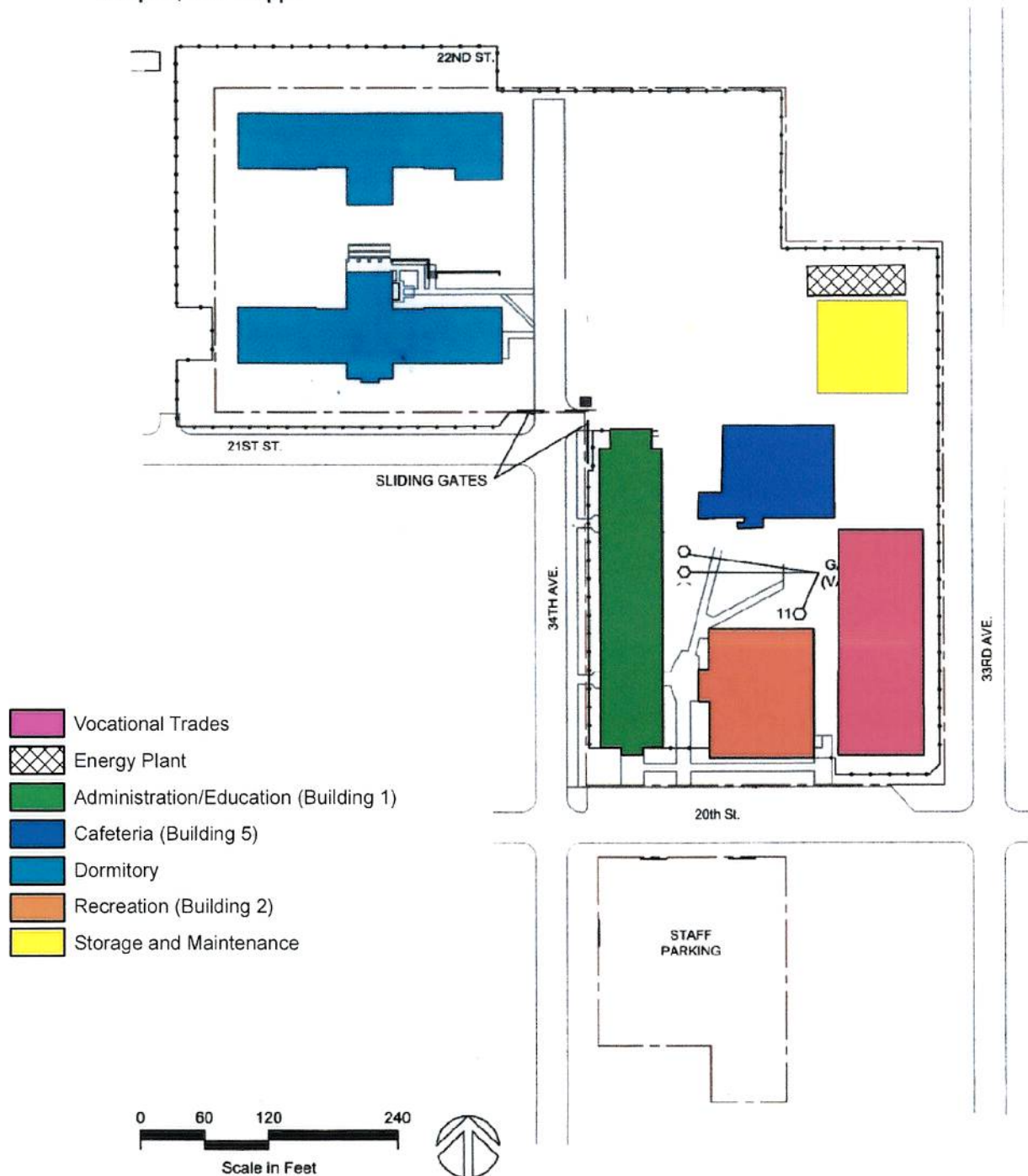


Figure 4. Alternative 1 Site Plan

# Gulfport Job Corps Center

Gulfport, Mississippi

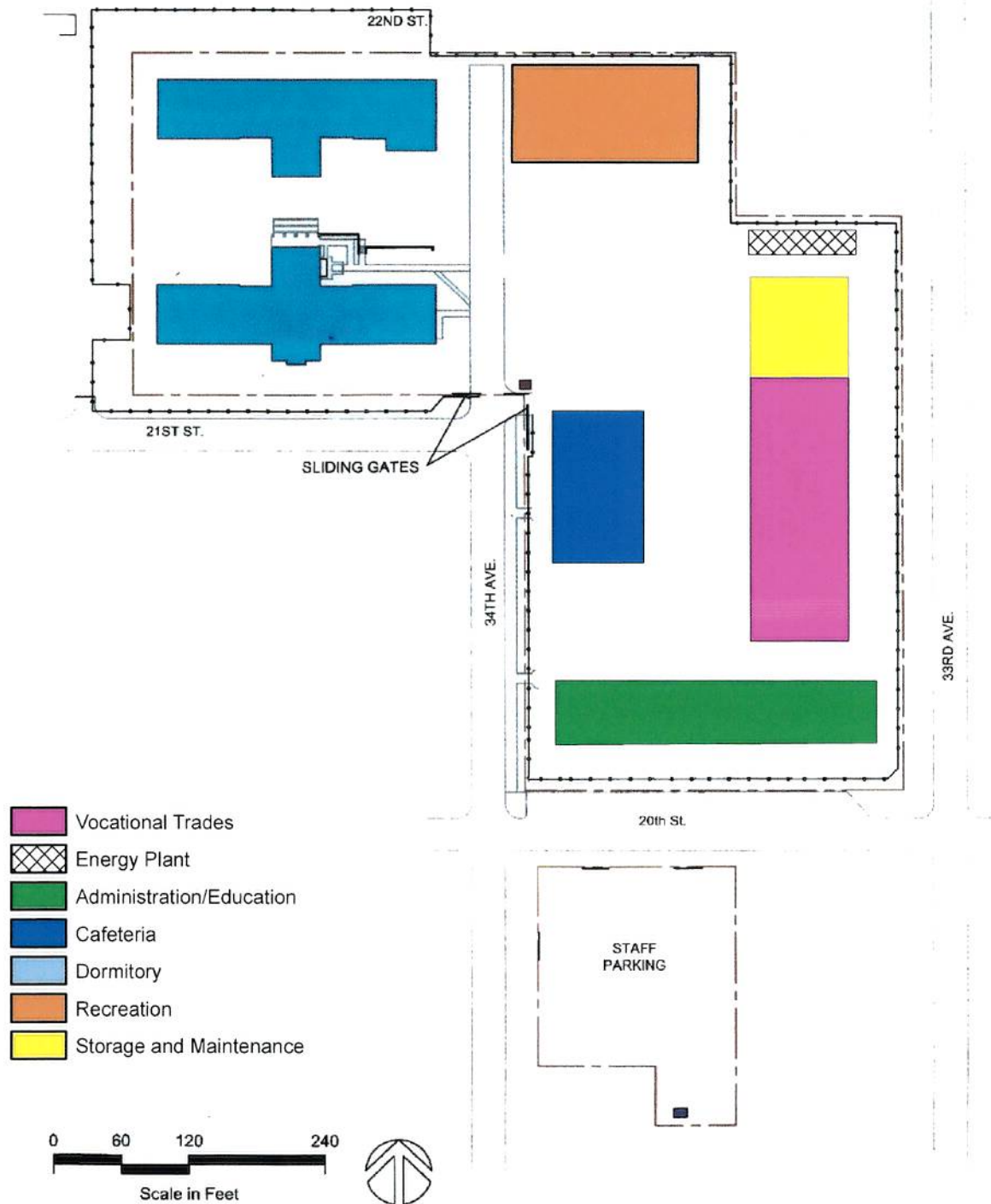


Figure 5. Alternative 2 Site Plan



# Gulfport Job Corps Center

Gulfport, Mississippi

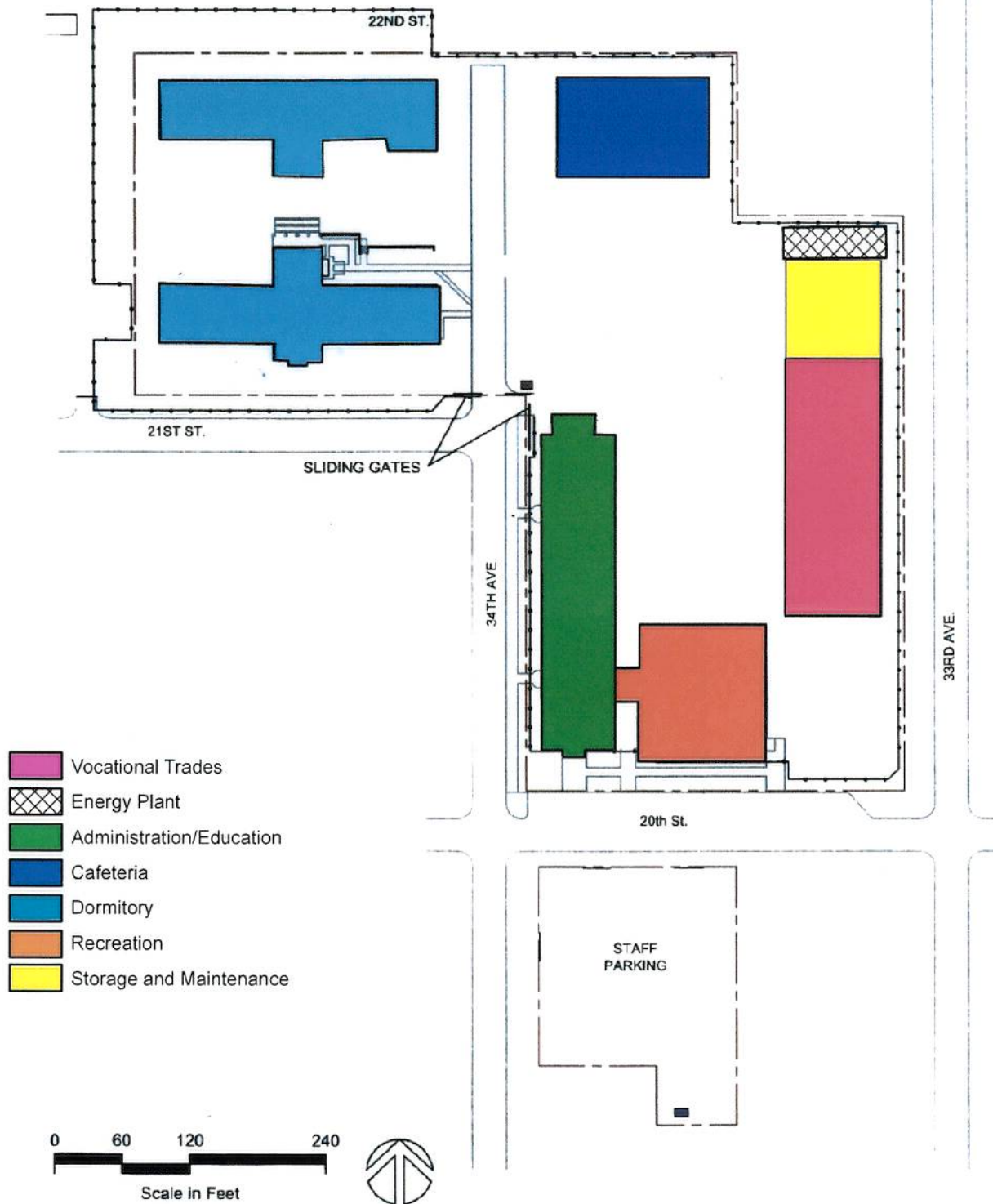


Figure 6. Preferred Alternative Site Plan